

June 20, 2007

Dr. Steve Sprunger, Superintendent
East Noble School Corporation #6060
702 East Dowling Street
Kendallville, Indiana 46755

Dear Dr. Sprunger:

On May 14, 2007, the Indiana Department of Education's monitoring team commenced an on-site monitoring review of the East Noble School Corporation's administration of Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB). Enclosed is a report based upon this review.

Prior to, during, and following the on-site monitoring review, the IDOE team conducted a number of activities (described in the attached report) to verify compliance with 1) the programmatic requirements of Title I, Part A; and 2) the fiscal requirements that must be followed by recipients of Title I, Part A educational funds.

The enclosed report summarizes the results of our on-site monitoring review. **Within 30 business days of the start of the 2007-2008 school year**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, **East Noble School Corporation is responsible for taking appropriate action to remedy compliance deficiencies**. In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer term measures are necessary, East Noble School Corporation must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE will be happy to provide technical assistance to East Noble School Corporation where appropriate.

The IDOE team would like to thank you, Rebecca Perkins and other staff for their work and assistance provided prior to and during the review in gathering materials and providing access to information in a timely manner. We commend Ms. Perkins for doing an excellent job of administering the Title I program

We look forward to continued cooperation in working with you and your staff members on any follow-up activities and in assisting East Noble School Corporation to improve the delivery of Title I services.

Sincerely,

Lee Ann Kwiatkowski, Director
Division of Compensatory Education

cc: Rebecca Perkins, Title I Program Administrator
East Noble School Corporation #6060

Linda Miller, Assistant Superintendent of Community Relations
and Special Populations, IDOE

**Indiana Department of Education
Title I, Part A Monitoring**

District: East Noble School Corporation #4245

Monitoring Dates: May 14, 2007

Monitoring Team: Lee Ann Kwiatkowski, Hazel Beasley, Teresa Neely, Cindy Hurst, Linda Ricketts, and Laura Cope

Background Information

The Indiana Department of Education (IDOE) commenced on-site monitoring of the East Noble School Corporation on May 14, 2007. The purpose of this monitoring visit was to identify areas of strength, areas that need improvement, and areas of non-compliance with Title I, Part A and federal grants management (fiscal) requirements.

IDOE specifically monitored in the following areas:

Monitoring Topic	Statutory Citation
1) Compliance with professional qualification requirements for teachers and paraprofessionals	NCLB §1111(h)(6)(A) NCLB §1119(c)(1) NCLB §9101(23)
2) Compliance with parental involvement requirements	NCLB §1118(a)-(h) NCLB §1111(c)(14) NCLB §1111(d) NCLB §1116(a)(1)(D) NCLB §9101(32)
3) Compliance with professional development requirements	NCLB §1116(a)(1)(D) NCLB §9101(34)
4) Compliance with school improvement requirements	NCLB §1116(b) NCLB §1116(c) NCLB §1116(e)
5) Compliance with district improvement requirements	NCLB §1116(c)
6) Compliance with schoolwide program requirements	NCLB §1114
7) Compliance with targeted assistance program requirements	NCLB §1115
8) Compliance with school ranking and serving requirements	NCLB §1113
9) Compliance with comparability requirement	NCLB §1120A

10) Compliance with maintenance of effort requirement	NCLB §1120A NCLB §9521
11) Compliance with equitable services to private school students requirements	NCLB §1120
12) Compliance with statutory set-aside requirements	NCLB §1113 NCLB §1116 NCLB §1118
13) Compliance with supplement, not supplant requirements	NCLB §1120A
14) Compliance with financial management systems requirements	EDGAR §80.20
15) Compliance with compensation for personnel services requirements	OMB Circular A-87, Attachment B, Section 8
16) Compliance with complaint procedures	Subpart F—Complaint Procedure (CFR, Title 34)
17) Compliance with equipment requirements	EDGAR §80.32 OMB Circular A-87
18) Compliance with Neglected Institutes	NCLB §1401
19) Compliance with Delinquent Institutes	NCLB §1401

During the on-site visit, IDOE spent time interviewing staff from East Noble School Corporation at their central office. In addition, IDOE visited North Side and South Side Elementary School, where interviews were conducted with the principal and the Title I staff.

IDOE also reviewed East Noble School Corporation's documents, including district policies and procedures, district notices to parents, district plans, school plans, personnel information, budget documents, contracts, and expenditure reports.

Based on the above information, our report follows.

Monitoring Topic 1: Compliance with NCLB professional qualification requirements for teachers and paraprofessionals

Background

IDOE interviewed the Title I Program Administrator and building principals. In addition, IDOE reviewed letters to personnel.

Statutory Requirement: Professional qualifications requirements are contained in Sections 1111 and 1119 of Title I. In addition, “highly qualified” is defined in Section 9101(23) of the general provisions section of NCLB.

Areas of Compliance

Principal Attestation: East Noble School Corporation ensures that the principal of the school receiving Title I funds has attested annually, in writing, as to whether the school is in compliance with the professional qualification requirements of NCLB. As part of the annual application review, grant approval is not given unless each principal has signed a template attesting that their school is in compliance with the professional qualification requirements of NCLB.

Title I Instructional Paraprofessional Requirements: All Title I instructional paraprofessionals meet the statutory requirements for “highly qualified”. The instructional paraprofessional works under the direct supervision of a licensed teacher. The teacher prepares the lesson plans and plans the support activities that the paraprofessional carries out, and evaluates the achievement of the students with whom the paraprofessional is working. The paraprofessional works in the classroom; this ensures that the paraprofessional is working in close and frequent proximity to the teacher.

Professional Qualification Requirements: East Noble School Corporation was able to provide evidence that all core academic teachers and instructional paraprofessionals meet the highly qualified requirements.

5% Set-aside: East Noble School Corporation did not reserve 5% of its allocation to support assisting teachers in reaching the professional qualification requirements. All teachers in Title I schools are highly qualified.

Parents’ Right to Know Regarding Request for Teacher Qualifications: East Noble School Corporation was able to demonstrate that letters had either been mailed to all parents of students attending Title I schools or distributed through the handbook (in which parents had to sign for receipt) informing the parents of their right to know about the qualifications of the student’s classroom teacher and where relevant, paraprofessionals.

Parents' Right-To-Know Regarding Non-highly Qualified Teacher: East Noble School Corporation did not have any students that had been taught by a teacher for four or more consecutive weeks that was not highly qualified.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1

None.

Monitoring Topic 2: Compliance with parental involvement requirements

Background

IDOE interviewed the Title I Program Administrator and building principals.

Statutory Requirement: Parental involvement requirements are contained throughout Title I, specifically in Sections 1111, 1116, and 1118. In addition, parental involvement is defined in Section 9101(23) of the general provisions section of NCLB.

Areas of Compliance

LEA Parent Involvement Policy: East Noble School Corporation showed evidence of a district parental involvement policy which included all statutory components and were revised with Title I parent input.

School Parental Involvement Policy: East Noble School Corporation showed evidence of parental involvement policies that included all statutory components and were revised with Title I parent input.

School-Parent Compact: East Noble School Corporation showed evidence of school-parent compacts that included all statutory components and were revised with Title I parent input.

Annual meeting: East Noble School Corporation showed evidence that all Title I schools held an annual meeting for Title I parents. Each school created fliers or brochures to send home to families, developed agendas for the meetings, and had parent sign-in sheets. East Noble School Corporation held a district session in addition to the individual school meetings.

Parent Information Resource Center (PIRC): East Noble School Corporation showed evidence that PIRC information was included within the Parent's Right-to-Know letter.

Building Capacity for Strong Parental Involvement: East Noble School Corporation showed evidence of building capacity with its Title I parents. Schools send home backpacks for children to use at home with their parents. The backpacks contain leveled books at the child's reading level. East Noble School Corporation offered a variety of ways and times that parents could choose to be involved within the school community or working with their child at home on educational skills.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2

Reviews Effectiveness of Parental Involvement Activities: East Noble School Corporation encourages parent input on activities and programs offered throughout the year. However, parents are not directly surveyed or asked to comment on the quality or usefulness of such activities.

Required Action: East Noble School Corporation must develop a stronger evaluation for the effectiveness of the parental involvement activities, which may include evaluations for parents to complete after participating in an activity.

Other Matters:

Distribution of Policies to Parents: East Noble School Corporation sent home parent policies and compacts with the students in their backpacks. During our visit, East Noble School Corporation decided and added to their compacts acknowledging receipts of the policies. The district plans to follow up with each family that does not return a signed compact to ensure that every family received one.

Monitoring Topic 3: Compliance with Professional Development Requirements

Background

IDOE interviewed the Title I Program Administrator and building principals regarding professional development requirements.

Statutory Requirement: Professional development requirements are contained throughout Title I, Part A. Professional development is defined in Section 9101(34) of the general provisions section of NCLB. Under Section §1116(a)(1)(D), school districts are responsible for reviewing the effectiveness of professional development activities carried out with Title I funds.

Areas of Compliance

High Quality, Ongoing Professional Development: East Noble School Corporation was able to show evidence that professional development opportunities in the district and Title I schools met the requirements set-forth in Title IX of NCLB. For instance, East Noble School Corporation is using literacy collaborative to help teachers develop instructional skills in the area of reading and writing. A two hour delay schedule is incorporated into the schedule to allow teachers to receive professional development training.

Review Effectiveness of Professional Development: East Noble School Corporation informally reviews the effectiveness of professional development opportunities. Teachers earn points based on the professional development activities that they participate in throughout the school year. However, no formal evaluation occurs to ensure that the professional development is resulting in increased teacher effectiveness and improved student academic achievement.

Recommendation: IDOE recommends that East Noble School Corporation develop and implement a system and formal process for reviewing the effectiveness of professional development.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 3

None.

Monitoring Topic 4: Compliance with school improvement, corrective action, restructuring, and alternative governance requirements; including proper implementation of public school choice and supplemental educational services.

Background

Statutory Requirement: School improvement, corrective action, restructuring, and alternative governance requirements, including proper implementation of public school choice and supplemental educational services are contained in Section 1116. Depending on the number of years a school has not made adequate yearly progress (AYP), the school, district, and in certain cases state, must take certain actions.

Areas of Compliance

East Noble School Corporation does not have any schools in improvement.

Monitoring Topic 5: Compliance with district improvement requirements

Background

Statutory Requirement: District (local educational agency) improvement requirements are contained in §1116(c).

Areas of Compliance:

East Noble School Corporation is not in LEA improvement.

Monitoring Topic 6: Compliance with schoolwide program requirements

Background

Statutory Requirement: The schoolwide program requirements are contained in Section 1114. In general, in an eligible schoolwide program school federal, state, and local funds can be combined to upgrade the entire educational program (except Reading First funds). Unlike a targeted assistance school, where certain students must be identified for Title I services, in a schoolwide program school all students are considered to be eligible for services and the goal is to upgrade the entire educational program of the school. In addition, in a schoolwide school, schools are not required to maintain separate fiscal records, by program, that identify activities supported with particular funds as long as the school maintains records that demonstrate that the schoolwide program, as a whole, addresses the intent and purposes of each Federal program that was consolidated.

Areas of Compliance

East Noble School Corporation does not have a schoolwide program.

Monitoring Topic 7: Compliance with targeted assistance program requirements

Background

IDOE interviewed the Title I Program Administrator and building principals regarding targeted assistance school program requirements.

Statutory Requirement: The targeted assistance program requirements are contained in Section 1115. In a targeted assistance school, a school must maintain a list of eligible children who receive Title I services. Eligible children are children identified by the school as failing, or most at risk of failing, to meet the State's challenging student academic achievement standards.

Areas of Compliance:

Targeted Assistance Program: East Noble School Corporation provided evidence that Title I program resources are used to help participating students meet the state's academic achievement standards. Scientifically-based research strategies are used in Title I instruction, such as Reading Recovery. Title I staff has a fixed schedule of daily responsibilities.

Coordination and Integration of Staff: East Noble School Corporation was able to demonstrate that the Title I staff coordinate with classroom teachers and is involved in the same professional development opportunities.

Student Selection: East Noble School Corporation used multiple, educationally related criteria to determine the students who are the most academically at-risk to receive Title I services.

Proper Use of Funds: East Noble School Corporation was not able to demonstrate that funds were used only for those students served by Title I.

Program Evaluation: East Noble School Corporation assesses students using benchmark and common assessment data. The Developmental Reading Assessment (DRA) is also used to measure student progress. The program administrator has completed building observations of the Title I program four times throughout the 2006-2007 school year.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 7

None.

Monitoring Topic 8: Compliance with school ranking and serving requirements

Background

IDOE interviewed the Title I Program Administrator regarding the Title I ranking and serving requirements. In addition, IDOE reviewed documentation related to this requirement.

Statutory Requirement: The ranking and serving requirements are contained in Section 1113.

Areas of Compliance

Ranking and serving: East Noble School Corporation demonstrated compliance with the ranking and serving requirements.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 8

None.

Monitoring Topic 9: Compliance with comparability requirement

Background

IDOE interviewed the Program Administrator regarding the Title I comparability requirement. The Comparability Report for 2006-2007 was due on November 15, 2006.

Statutory Requirement: The comparability requirement is contained in Section 1120A.

Areas of Compliance

Comparability: East Noble Community School Corporation met compliance with comparability requirements.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 9

None.

Monitoring Topic 10: Compliance with maintenance of effort requirement

Background

The Indiana Department of Education conducts yearly review of maintenance of effort for all Title I schools.

Statutory Requirement: The maintenance of effort requirements are contained in Section 1120A of Title I and Section 9521 of the general provisions section of NCLB.

Areas of Compliance

East Noble School Corporation is in compliance with the maintenance of effort requirement.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 10

None.

Monitoring Topic 11: Compliance with equitable services to private school students' requirements

Background

IDOE interviewed the Title I Program Administrator regarding equitable services to private school students. In addition, IDOE reviewed documentation related to this requirement, and interviewed the nonpublic school administrator.

Statutory Requirements: The equitable services requirements are contained in Section 1120.

Student Selection: East Noble School Corporation provided evidence that appropriate criteria were used to identify eligible students for Title I services.

Equitable Services: East Noble School Corporation provided evidence of equitable services to the nonpublic school. Services were determined through the consultation with the nonpublic official and the Title I Program Administrator.

Consultation with Non-Public Officials: East Noble School Corporation was able to provide evidence that consultation between the district and nonpublic schools begins in the spring as the Title I grant for the following year is being developed and continues throughout the school year.

Supplies and Equipment: East Noble School Corporation provided evidence that the Title I teacher uses supplies and equipment that are properly identified as Title I.

Evaluation of Program: East Noble School Corporation provided information about the ongoing evaluation of progress. East Noble School Corporation consults with the principal concerning student progress.

Recommendation: IDOE recommends collecting teacher feedback on participating students' progress.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 11

None.

Monitoring Topic 12: Compliance with statutory set-aside requirements

Background

IDOE interviewed the Title I Program Administrator regarding the Title I statutory set-aside requirements.

Statutory Requirements: The statutory set-aside requirements are contained throughout Title I, including required reservations for neglected and delinquent children; homeless children, public school choice, supplemental educational services, school improvement, parental involvement and professional development (see Sections 1113, 1116, and 1118).

Areas of Compliance

Homeless students: East Noble School Corporation did not set-aside money for homeless students. The district relies on building principals to determine the current number of homeless students in the district. If services are needed for homeless students other funds are used.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 12

None.

Monitoring Topic 13: Compliance with supplement, not supplant requirements

Background

IDOE interviewed the Title I Program Administrator regarding the Title I supplement, not supplant requirements.

Statutory Requirement: Section 1120A requires Title I funds to supplement, not supplant non-Federal sources of funds.

Areas of Compliance

Expenditures and Approved Budget: East Noble Corporation provided evidence that the expenditures for the 2005-2006 school year matched the approved budget.

Targeted Assistance Program Expenditures: East Noble School Corporation was able to provide evidence that expenditures for targeted assistance programs did not supplant non-federal resources.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 13

None.

Monitoring Topic 14: Compliance with financial management systems requirements

Background

IDOE interviewed the assistant treasurer and the program administrator regarding East Noble School Corporation's financial management system.

Regulatory Requirement: Section 80.20 (b)-(i) of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements financial management systems for non-State grantees (such as school districts).

Areas of Compliance

Purchasing: East Noble School Corporation provided an understanding of the process of an expense going from the budget page to ordering and procurement. The Title I teacher completes a requisition and sends it to the program administrator. The program administrator approves the requisition. The materials are sent to the school where the

teacher informs the program administrator if the correct items have arrived. The program administrator signs off on the purchase and the business office submits payment.

Expenditure Monitoring Systems: East Noble School Corporation filed quarterly and final expenditure reports on time.

Salaries and Benefits: East Noble School Corporation showed evidence that the Title I funds used for salaries and related benefits matched the personnel in the 2005-2006 Title I application. IDOE checked salaries and benefits for South Side and North Side Elementary schools.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 14

None.

Monitoring Topic 15 Compliance with compensation for personnel services requirements

Background

IDOE interviewed the Title I Program Administrator in regard to the compensation for personnel services requirements.

Circular Requirement: OMB Circular A-87, Attachment B, Section 8 details the requirements for all compensation for personnel services supported with federal funds. This section includes the time distribution and semi-annual certification requirements.

Areas of Compliance

Compensation for personnel services requirements: East Noble School Corporation was able to demonstrate sufficient compliance with the requirements of OMB Circular A-87, Attachment B, Section 8.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 15

None.

Monitoring Topic 16: Compliance with complaint procedure

Background

IDOE interviewed the Title I Program Administrator regarding East Noble School Corporation's complaint procedure.

Regulatory Requirement: The SEA must adopt complaint procedures. The LEA must incorporate the elements required by NCLB for formal complaint procedures into local complaint procedure policies. The LEA must issue appropriate guidance to the schools. Complaint procedures are contained in Subpart F—Complaint Procedure (CFR, Title 34).

Areas of Compliance

Complaint Process: East Noble School Corporation was able to demonstrate that the district has a complaint procedure. No complaints have been filed.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 16

None.

Monitoring Topic 17: Compliance with equipment requirements

Background

IDOE interviewed the Title I Program Administrator and treasurer regarding equipment acquired with Title I, Part A funds.

Regulatory Requirement: Section 80.32(b)-(h) of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements for the use, management and disposition of equipment acquired with federal funds by non-State grantees (such as school districts).

Areas of Compliance

Title I Equipment: East Noble School Corporation showed evidence that Title I equipment and technology was properly tagged.

Equipment and Technology Inventory: East Noble School Corporation has inventory lists that meet the requirements of EDGAR 80.32.

Recommendation: East Noble School Corporation's inventory list has the individual school listed for the location. IDOE recommends that East Noble School Corporation add the room number to the location to help with ease of locating material. Since Wayne Center Elementary will no longer be served with Title I funds during the 2007-2008 school year, this equipment will need to be moved to the school most in need of the materials.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 17

None.

Monitoring Topic 18: Compliance with Neglected Institutions: Funded through Title I, Part A

Background

East Noble School Corporation does not have any neglected institutions funded through Title I, Part A.

Monitoring Topic 19: Compliance with Delinquent Institutions: Funded through Title I, Part D, Subpart 2

Background

East Noble School Corporation does not have any delinquent institutions funded through Title I, Part D, Subpart 2.